

**TECHNICAL REVIEW AND EVALUATION
OF APPLICATION FOR
AIR QUALITY PERMIT NO. 31825**

I. INTRODUCTION

This class II permit is issued to ERGON Asphalt Products, Inc. for the operation of asphalt storage, blending and distribution facility located in Snowflake, Navajo County, Arizona.

Company Information

Facility Name: ERGON Asphalt Products, Inc.

Mailing Address: PO Box 1639
Jackson, MS 39215-1639

Facility Location: 400 North Industrial Way
Snowflake, AZ 85937

II. FACILITY DESCRIPTION

Raw asphalt is mixed with additives and emulsifiers to manufacture various grades of asphalt products. The finished products are stored in tanks prior to shipment by trucks. This process is supported by a 10.5 MMBtu/hr boiler, a 7.3 MMBtu/hr hot oil heater and various storage tanks for asphalt, emulsifiers and additives. The boiler and hot oil heater are permitted to operate for 8760 hours per year. The facility is permitted to burn natural gas or Fuel Oil No. 2 in the boiler and hot oil heater.

III. EMISSIONS

The facility is classified as a Minor Source pursuant to A.A.C. R18-2-302.B.2. The potential emission rates of the following criteria pollutants are not greater than major source thresholds. Table 1 shows the potential emissions from the boiler, heaters and storage tanks.

Table 1: Facility-wide Emissions of regulated air pollutants

Pollutant	Emissions from Heater/Boiler tons/year	Emission from Storage Tanks tons/year	Total tons/year
CO	2.86		2.86
NO _x	11.43		11.43
SO ₂	40.56		40.56
PM ₁₀	1.14		1.14
VOC	0.11	0.83	0.94

IV. APPLICABLE REGULATIONS

The Permittee has identified the applicable regulations that apply to each unit in its permit application. The following table summarizes the findings of the Department with respect to the regulations that are applicable to each emissions unit. Previous permit conditions are discussed under Section IV of this technical review document.

Table 2: Applicable Regulations

Unit ID	Control Equipment	Applicable Regulations	Verification
Hot Oil Heater	None	A.A.C. R18-2-724	This rule applies to all indirect fire furnaces
Boiler	None	40 CFR 60 Subpart Dc	This NSPS regulation is applicable to Boilers greater than 10 MM Btu/hr.
Storage Tanks	None	A.A.C. R18-2-710	This rule applies to all storage tanks.
Non-Point sources	Water and other reasonable precautions	Article 6	The regulations listed are applicable to non point sources.
Mobile Sources	None	A.A.C. R18-2-801, -802.A, and -804	These regulations are applicable to all mobile sources.
Other periodic activities	None	A.A.C. R18-2-726, -727, -1101	These regulations are applicable to periodic activities such as abrasive blasting, spray painting and demolition/renovation.

V. PERIODIC MONITORING AND RECORDKEEPING

A. Hot Oil Heater (Non NSPS)

- Hot Oil Heater is subject to 15% opacity standard. A certified EPA Reference Method 9 observer shall conduct a monthly survey of visible emissions from the stack of the boiler and heaters. If the opacity appears to be greater than 15%, the observer shall conduct a certified EPA Reference Method 9 observation. The Permittee shall keep records of the initial observation and any EPA Reference Method 9 observation performed. These records shall include the type of observation performed, emission point observed, name of observer, date and time of observation and the result of the observation.
- The Permittee is allowed to burn only natural gas or No.2 fuel oil (sulfur less than 0.9 weight percent). Permittee is required to maintain records of fuel certification.

B. Steam Boiler (NSPS)

The steam boiler (10.5 MMBtu/hr) is subject to NSPS requirements (40 CFR 60 Subpart Dc). The Permittee is allowed to burn only natural gas or No.2 fuel oil (sulfur less than 0.5 weight percent). Permittee is required to maintain records of fuel certification and fuel usage.

- C. The non-point sources are subject to 40% opacity standard. The Permittee will conduct monthly visual survey and, if required, EPA Reference Method 9 observation for the non-point sources. The Permittee shall keep records of survey/ EPA Reference Method 9 observation performed.

VI. LIST OF ABBREVIATIONS

A.A.C.	Arizona Administrative Code
ADEQ	Arizona Department of Environmental Quality
MM Btu/hr	Million British Thermal Units per hour
CO	Carbon Monoxide
EPA	Environmental Protection Agency
lb/hr	Pound per Hour
NO _x	Nitrogen Oxides
PM	Particulate Matter
PM ₁₀	Particulate Matter Nominally less than 10 Micrometers
SO ₂	Sulfur Dioxide
VOC	Volatile Organic Compound